

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF  
AMERICA,**

**Plaintiff and Counter-Defendant,**

**and**

**WAYNE LAPIERRE,**

**Third-Party Defendant,**

**V.**

**ACKERMAN MCQUEEN, INC.,**

**Defendant and Counter-Plaintiff,**

**and**

**MERCURY GROUP, INC., HENRY  
MARTIN, WILLIAM WINKLER,  
MELANIE MONTGOMERY, and JESSE  
GREENBERG,**

## Defendants.

**Civil Action No. 3:19-cv-02074-G**

**NOTICE AND SUGGESTION OF BANKRUPTCY**  
**FOR THE NATIONAL RIFLE ASSOCIATION OF AMERICA AND SEA GIRT LLC**

Please be advised that the National Rifle Association of America (the “NRA” or the “Association”) and Sea Girt LLC (“Sea Girt”) (collectively, the “Debtors”), filed petitions commencing voluntary cases under chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1532, as amended (the “Bankruptcy Code”) on January 15, 2021. The bankruptcy cases are pending in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, and are administered under Case Nos. 21-30080-11 and 21-30085-11.

Section 362(a) (Automatic Stay) of the Bankruptcy Code, 11 U.S.C. §362(a), automatically prohibits, *inter alia*, the following:

- the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title;
- the enforcement, against the debtor or against property of the estate, of a judgment obtained before the commencement of the case under this title;
- any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate.

Dated: January 15, 2021

Respectfully submitted,

/s/ Michael J. Collins

Michael J. Collins, Esq.

State Bar No. 00785493

mjc@brewerattorneys.com

Alessandra P. Allegretto

State Bar No. 24109575

apa@brewerattorneys.com

1717 Main Street, Suite 5900

Dallas, Texas 75201

Telephone: (214) 653-4000

Facsimile: (214) 653-1015

**ATTORNEYS FOR PLAINTIFF AND  
COUNTER-DEFENDANT NATIONAL RIFLE  
ASSOCIATION OF AMERICA**